

# EDVANTAGES

*Giving Schools the Edge.*

Per the rules of the appeal process, the applicant is to cite the language or text from the Notification of Commitment Adjustment letter that is the subject of the appeal.

***“During the course of a review it was determined that the technology plan for this entity was not approved at the time of submission of the Form 486.”***

At the time of the original site visit to Trotwood Preparatory and Fitness Academy by Bearing Point I provided documentation that our Technology Plan was approved in early 2004. In the course of your investigation, the Ohio State E-Rate Coordinator was contacted by Cynthia Beach, SLD Washington, to clarify the Technology Plan approval process for Ohio and the approval date for Trotwood Academy. Attached documentation (see attachment 1) from the Ohio E-Rate Coordinator to Ms Beech at SLD, sent May 24, 2006, verifies that our Technology Plan was in fact approved by the eTech Ohio Commission (then Ohio SchoolNet Commission) the state approving authority, on April 14, 2004. Unfortunately, COMAD letters were sent before all relevant information was received and reviewed. The Technology Plan was in fact approved prior to the submission of the Form 486 for Funding Years 2004 and 2005.

This school has a Free & Reduced Lunch Count of over 78%. Unreasonable denial of funds already received for services rendered would be a tremendous hardship for our small low-wealth community school. The evidence shows that the COMAD decision to deny funding for Funding Year 2004 and 2005 is clearly in error.

We ask your consideration in the reversal of this decision and the restoration of funds for periods when our Technology Plan was approved, beginning April 14, 2004.

Sincerely,

Myrrha Pammer-Satow  
Superintendent & CEO

Joanne Neal  
E-Rate Coordinator



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2005-2006**

November 21, 2006

Myrrha Pammer-Satow  
Edvantages, Inc.  
3100 Shiloh Springs Road  
Trotwood, OH 45426

Re: Applicant Name: TROTWOOD PREP AND FITNESS  
ACADEMY  
Billed Entity Number: 233811  
Form 471 Application Number: 466681  
Funding Request Number(s): 1294103, 1297988  
Your Correspondence Dated: June 14, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2005 Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1294103, 1297988  
Decision on Appeal: Denied  
Explanation:

- After a thorough review of the appeal and all relevant supporting documentation, it was determined that a site-visit was performed on February 28, 2006. After reviewing the audit support documentation it was determined that the Technology Plan's Budget and Evaluation phases were not completed at the time of the site-visit. According to the official audit report, Joanne Neal provided a printout from the Ohio School Net Commission (OSC) website, which she stated at the time of the audit that this document serves as the Technology Plan Approval Letter (TPAL) for the Trotwood Prep and Fitness Academy (TPFA) for Funding Year Seven (2004-2005). It was determined that the provided printout appears to track the completion status of the TPFA's Technology Plan as each phase is completed and shows that the budget and evaluation phases of the Technology Plan were not

properly completed. During the site-visit, Ms. Neal had stated that the budget and evaluation sections of the TPAL had "minor issues" that the TPFA needed to fix, such as "filling in budget figures." It was determined that the TPAL printout does not appear to reference the funding years that it covers or the length of time it is in effect, but Ms. Neal stated that it covers the same funding years as the Technology Plan, which were Funding Years 2003-2005. Ms. Neal stated that she contacted the OSC to provide an updated version of the TPAL and would fax it to the Outreach project office as soon as possible. It is noted that TPFA provided the Technology Plan approval certification on March 9, 2006. On appeal it was determined that the Technology Plan approval certification submitted on March 9, 2006 will be accepted. However, since TPFA did not have an approved Technology Plan prior to the start of service on September 1, 2005 (per Form: 486, Application Number: 312302) which was filed on September 28, 2005 for FRN 1297988, or July 1, 2005 (per Form: 486, Application Number: 303836) which was filed on July 20, 2005 for FRN 1294103, USAC has correctly rescinded the commitment in full and will continue to seek recovery of any incorrectly disbursed funds.

During the course of the appeal review it was determined that the technology plan for this entity was not approved at the time of submission of the Form 486. Program rules require applicants to obtain approval of technology plans by parties qualified to approve technology plans, prior to submitting the Form 486, for services other than basic telecommunications service. Since this is not a request for basic telecommunications service, the technology plan needed to be approved prior to submitting the Form 486 or the start of services, whichever was earlier. Consequently, your appeal is denied in full.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Joanne Neal



**Universal Service Administrative Company**  
*Schools & Libraries Division*

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**Administrator's Decision on Appeal – Funding Year 2005-2006**

November 21, 2006

Myrrha Pammer-Satow  
Edvantages, Inc.  
3100 Shiloh Springs Road  
Trotwood, OH 45426

Re: Applicant Name: TROTWOOD PREP AND FITNESS  
ACADEMY  
Billed Entity Number: 233811  
Form 471 Application Number: 466699  
Funding Request Number(s): 1283249, 1283266, 1283284, 1283292  
Your Correspondence Dated: June 14, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2005 Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1283249, 1283266, 1283284, 1283292  
Decision on Appeal: **Denied**  
Explanation:

- After a thorough review of the appeal and all relevant supporting documentation, it was determined that a site-visit was performed on February 28, 2006. After reviewing the audit support documentation it was determined that the Technology Plan's Budget and Evaluation phases were not completed at the time of the site-visit. According to the official audit report, Joanne Neal provided a printout from the Ohio School Net Commission (OSC) website, which she stated at the time of the audit that this document serves as the Technology Plan Approval Letter (TPAL) for the Trotwood Prep and Fitness Academy (TPFA) for Funding Year Seven (2004-2005). It was determined that the provided printout appears to track the completion status of the TPFA's Technology Plan as each phase is completed and shows that the budget and evaluation phases of the Technology Plan were not

properly completed. During the site-visit, Ms. Neal had stated that the budget and evaluation sections of the TPAL had "minor issues" that the TPFA needed to fix, such as "filling in budget figures." It was determined that the TPAL printout does not appear to reference the funding years that it covers or the length of time it is in effect, but Ms. Neal stated that it covers the same funding years as the *Technology Plan, which were Funding Years 2003-2005*. Ms. Neal stated that she contacted the OSC to provide an updated version of the TPAL and would fax it to the Outreach project office as soon as possible. It is noted that TPFA provided the Technology Plan approval certification on March 9, 2006. On appeal it was determined that the Technology Plan approval certification submitted on March 9, 2006 will be accepted. However, since TPFA did not have an approved Technology Plan prior to the start of service on February 15, 2006 (per Form: 486, Application Number: 335054) which was filed on March 7, 2006, USAC has correctly rescinded the commitment in full and will continue to seek recovery of any incorrectly disbursed funds.

During the course of the appeal review it was determined that the technology plan for this entity was not approved at the time of submission of the Form 486. Program rules require applicants to obtain approval of technology plans by parties qualified to approve technology plans, prior to submitting the Form 486, for services other than basic telecommunications service. Since this is not a request for basic telecommunications service, the technology plan needed to be approved prior to submitting the Form 486 or the start of services, whichever was earlier. Consequently, your appeal is denied in full.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Joanne Neal



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2004-2005**

November 21, 2006

Myrrha Pammer-Satow  
Edvantages, Inc.  
3100 Shiloh Springs Road  
Trotwood, OH 45426

Re: Applicant Name: TROTWOOD PREP AND FITNESS  
ACADEMY  
Billed Entity Number: 233811  
Form 471 Application Number: 419208  
Funding Request Number(s): 1167842  
Your Correspondence Dated: June 14, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2004 Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1167842  
Decision on Appeal: **Denied**  
Explanation:

- After a thorough review of the appeal and all relevant supporting documentation, it was determined that a site-visit was performed on February 28, 2006. After reviewing the audit support documentation it was determined that the Technology Plan's Budget and Evaluation phases were not completed at the time of the site-visit. According to the official audit report, Joanne Neal provided a printout from the Ohio School Net Commission (OSC) website, which she stated at the time of the audit that this document serves as the Technology Plan Approval Letter (TPAL) for the Trotwood Prep and Fitness Academy (TPFA) for Funding Year Seven (2004-2005). It was determined that the provided printout appears to track the completion status of the TPFA's Technology Plan as each phase is completed and shows that the budget and evaluation phases of the Technology Plan were not

properly completed. During the site-visit, Ms. Neal had stated that the budget and evaluation sections of the TPAL had "minor issues" that the TPFA needed to fix, such as "filling in budget figures." It was determined that the TPAL printout does not appear to reference the funding years that it covers or the length of time it is in effect, but Ms. Neal stated that it covers the same funding years as the Technology Plan, which were Funding Years 2003-2005. Ms. Neal stated that *she contacted the OSC to provide an updated version of the TPAL and would fax it to the Outreach project office as soon as possible.* It is noted that TPFA provided the Technology Plan approval certification on March 9, 2006. On appeal it was determined that the Technology Plan approval certification submitted on March 9, 2006 will be accepted. However, since TPFA did not have an approved Technology Plan prior to the start of service on July 1, 2004 (per Form: 486, Application Number: 285623) which was filed on December 17, 2004, USAC has correctly rescinded the commitment in full and will continue to seek recovery of any incorrectly disbursed funds.

During the course of the appeal review it was determined that the technology plan for this entity was not approved at the time of submission of the Form 486. Program rules require applicants to obtain approval of technology plans by parties qualified to approve technology plans, prior to submitting the Form 486, for services other than basic telecommunications service. Since this is not a request for basic telecommunications service, the technology plan needed to be approved prior to submitting the Form 486 or the start of services, whichever was earlier. Consequently, your appeal is denied in full.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2003-2004**

November 21, 2006

Myrrha Pammer-Satow  
Edvantages, Inc.  
3100 Shiloh Springs Road  
Trotwood, OH 45426

Re: Applicant Name: TROTWOOD PREP AND FITNESS  
ACADEMY  
Billed Entity Number: 233811  
Form 471 Application Number: 370730  
Funding Request Number(s): 1011552, 1011570  
Your Correspondence Dated: June 14, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2003 Commitment Adjustment Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1011552, 1011570  
Decision on Appeal: **Denied**  
Explanation:

- After a thorough review of the appeal and all relevant supporting documentation, it was determined that a site-visit was performed on February 28, 2006. After reviewing the audit support documentation it was determined that the Technology Plan's Budget and Evaluation phases were not completed at the time of the site-visit. According to the official audit report, Joanne Neal provided a printout from the Ohio School Net Commission (OSC) website, which she stated at the time of the audit that this document serves as the Technology Plan Approval Letter (TPAL) for the Trotwood Prep and Fitness Academy (TPFA) for Funding Year Seven (2004-2005). It was determined that the provided printout appears to track the completion status of the TPFA's Technology Plan as each phase is completed and shows that the budget and evaluation phases of the Technology Plan were not



properly completed. During the site-visit, Ms. Neal had stated that the budget and evaluation sections of the TPAL had "minor issues" that the TPFA needed to fix, such as "filling in budget figures." It was determined that the TPAL printout does not appear to reference the funding years that it covers or the length of time it is in effect, but Ms. Neal stated that it covers the same funding years as the Technology Plan, which were Funding Years 2003-2005. Ms. Neal stated that she contacted the OSC to provide an updated version of the TPAL and would fax it to the Outreach project office as soon as possible. It is noted that TPFA provided the Technology Plan approval certification on March 9, 2006. On appeal it was determined that the Technology Plan approval certification submitted on March 9, 2006 will be accepted. However, since TPFA did not have an approved Technology Plan prior to the start of service on February 15, 2006 (per Form: 486, Application Number: 335054) which was filed on March 7, 2006 for Funding Year 2005, USAC has correctly rescinded the commitment in full and will continue to seek recovery of any incorrectly disbursed funds.

During the course of the appeal review it was determined that the technology plan for this entity was not approved at the time of submission of the Form 486. Program rules require applicants to obtain approval of technology plans by parties qualified to approve technology plans, prior to submitting the Form 486, for services other than basic telecommunications service. Since this is not a request for basic telecommunications service, the technology plan needed to be approved prior to submitting the Form 486 or the start of services, whichever was earlier. Consequently, your appeal is denied in full.

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Schools and Libraries Division  
Universal Service Administrative Company

• **From:** Farslow, Dan  
**Sent:** Wednesday, May 24, 2006 3:30 PM  
**To:** 'cbeach@usac.org'  
**Cc:** Kane, Scott  
**Subject:** Ohio Tech Plan - Trotwood Prep and Fitness Academy

**Attachments:** Trotwood Tech Plan Status.pdf  
 Cindy,

Thank you for reaching out to the eTech Ohio Commission regarding the status of the Technology Plan of Trotwood Preparatory and Fitness Academy, a Ohio community (public) school. As you are aware, Ohio public school applicants develop and complete a Technology Plan through the on-line eTech Ohio Commission "Technology Planning Tool." One benefit of an on-line tool is that various steps in the process are posted and transparent to those with access to the data base.

To provide some background, the original Technology Planning Tool (TPT) was developed several years ago when our agency was named the Ohio SchoolNet Commission. There have been several iterations of the on-line TPT culminating in the present model, identified as TPT Version 3.0 which was formalized in April 2006. Ohio public schools created Technology Plans under Version 2.5 prior to spring of 2006. Versions 2.5 is now not available on-line but the data are archived and available to authorized individuals.

That V 2.5 database indicates that Trotwood Preparatory and Fitness Academy initiated their 2003-2006 Technology Plan in October of 2003 and completed it on February 11, 2004. (Attached is a PDF "screen shot" of the Ohio SchoolNet/eTech Ohio database page of the "Status/Comment History Log" of Trotwood's Tech Planning history in the TPT.) The History Log indicates that Trotwood's Tech Plan status was changed to "Field Rep Review Completed" on April 14, 2004. The indication that the Tech Plan has its "Field Rep Review Completed" is the indication that Ohio SchoolNet (at that time) Field Rep staff had completed the review of the Plan and had approved the Technology Plan as finally written (there could have been several edits before the review completion date.)



Trotwood Tech Plan  
 Status.pdf ...

However, the TPT for Ohio process involves two more steps. For State of Ohio assurance that the Treasurer and Superintendent of the entity providing a Technology Plan are aware of and have reviewed their Tech Plan, both individuals are required to "sign off" on the Tech Plan electronically before eTech Ohio (then Ohio SchoolNet) will/would actually issue a formal letter of certification. It is my understanding that Treasurer/Superintendent sign-off is not a requirement of the federal E-Rate program, so, for the purposes of E-Rate compliance, the date of completion of the eTech Ohio (Ohio SchoolNet in this case) authorized Field Rep review would be the date of approval. In the Trotwood case that date of review completion was April 14, 2004.

The 2006 dates appear on the record (I was told) as a result of a test which resulted in the data being lost, being recovered and repopulated in the History log by our IT staff, most likely generated by Trotwood trying to find their previous Technology Plan certification history (in preparation for their site visit) and being unable to do so in the changing V 3.0 format. The 2006 inclusion history is an inaccurate result and program artifact of eTech Ohio's IT staff repopulating Trotwood's original data into the V 2.5 database.

In conclusion, I hope this long and cumbersome explanation provides a background of the

somewhat complicated and changing Technology Plan process for Ohio public schools and more specifically provides detail on the history of the Trotwood Preparatory and Fitness Academy Technology Plan approval process which culminated in a final Ohio SchoolNet (eTech Ohio now) approval through Field Rep review and on-line sign-off on April 14, 2004. eTech Ohio would be happy to generate and provide a more formal "certification" document if required. I would look forward to answering any further questions you might have.

Thanks again for reaching out to eTech Ohio.

Regards,

Dan Farslow

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Daniel L. Farslow, PhD  
E-Rate Support and Information  
State E-Rate Coordinator  
eTech Ohio Commission  
2323 West Fifth Avenue, Ste 100  
Columbus, OH 43204  
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